

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----	X	
UNITED STATES OF AMERICA,	:	
	:	
v.	:	20 Cr. 330 (AJN)
	:	
GHISLAINE MAXWELL,	:	NOTICE OF MOTION
	:	
Defendant.	:	ORAL ARGUMENT REQUESTED
	:	
-----	X	

**DEFENDANT GHISLAINE MAXWELL'S NOTICE OF MOTION UNDER THE DUE
PROCESS CLAUSE TO SUPPRESS ALL EVIDENCE OBTAINED FROM THE
GOVERNMENT'S SUBPOENA TO [REDACTED] AND TO DISMISS COUNTS
FIVE AND SIX
(Pretrial Motion # 3)**

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law and exhibits, Defendant Ghislaine Maxwell, through counsel, respectfully moves to suppress under the due process clause all evidence obtained from the government's subpoena to [REDACTED] and to dismiss Counts Five and Six.

Dated: January 25, 2021
New York, New York

Respectfully submitted,

s/ Jeffrey S. Pagliuca

Jeffrey S. Pagliuca
Laura A. Menninger
HADDON, MORGAN & FOREMAN P.C.
150 East 10th Avenue
Denver, CO 80203
Phone: 303-831-7364

Mark S. Cohen
Christian R. Everdell
COHEN & GRESSER LLP
800 Third Avenue
New York, NY 10022
Phone: 212-957-7600

Bobbi C. Sternheim
Law Offices of Bobbi C. Sternheim
33 West 19th Street - 4th Floor
New York, NY 10011
Phone: 212-243-1100

Attorneys for Ghislaine Maxwell